



**PARTNERSHIP  
FOR AMERICA'S  
CHILDREN**

State and local child advocates working  
together for a better future

**Public Comment of Deborah Stein, J.D., Network Director of the Partnership for America's Children to  
the Census National Advisory Committee Meeting, May 6-7, 2021**

**Submitted by email to [REDACTED]**

My name is Deborah Stein, and I am the Network Director of the Partnership for America's Children. The Partnership's mission is to support its network of state and community multi-issue child advocacy organizations in effective advocacy. The Partnership has 52 member organizations in 41 states that advocate to improve policies for children at the state, local and federal level. Collectively they represent over 90% of the nation's children. Partnership members use Census data in their advocacy, and thirty Partnership members are also KIDS COUNT grantees in their state, serving as that state's data hub on children for policy makers, administrators, and nonprofits.

The Partnership for America's Children served as the national hub on the undercount of young children in the 2020 Decennial Census. In this role the Partnership formed and continues to co-lead a national working group of child-serving organizations that is working to improve the count of young children in all Census Bureau demographic products.

I write today to submit the Partnership's comments for the May 2021 NAC meeting. The Partnership recommends

- the appointment of a senior staff member at the Census Bureau to oversee efforts to ensure an accurate count of young children for the decennial census, all demographic surveys, administrative records, population estimates, and other data activities, including participating from the beginning in the preparation for the 2030 Census
- evaluating the Census Bureau's efforts to count young children in the 2020 Census,
- using administrative records only to supplement, not replace, direct efforts in counting young children and ensuring that the use of administrative records address certain situations where young children are at risk of being missed,
- making the Post Enumeration Survey effective for assessing the accuracy of the count of young children,
- improving the quality of information from the Census Household Pulse survey with respect to young children, and
- making sure that research on improving the ACS includes measures specifically focused on improving the count of young children.

## **Coordinating Efforts to Improve the Count of Young Children and Ensure the Quality and Accessibility of Data About Young Children**

The Bureau needs to identify a central point of contact and responsibility for data on children. There should be a subject-matter expert focused on data products about young children, ensuring that the Bureau continues to work with data users to produce the data needed for appropriate distribution of federal funds and programmatic planning. In addition, someone should be coordinating research and evaluation work on the undercount of young children across directorates.

Children under age 5 were by far the most underreported age group in the 2010 Decennial Census, and children age 5 to 9 the second most. The children missed are disproportionately Black and Hispanic (we do not have data for other minority groups). This problem in counting young children exists across all Census demographic products and is seen in other countries as well.

<https://countallkids.org/resources/the-pervasive-nature-of-under-reporting-young-children-in-official-data/>

Therefore, the Bureau should incorporate into all its work a mechanism for improving the count of young children. In preparations for the 2020 Census, by 2018 the operational plan indicated very little focus on young children, and proposed wording changes had not been tested with targeted households. The extent to which the undercount of young children was overlooked is reflected in the fact that none of the over 40 focus groups in the CBAMs study were specifically for parents with young children, and the questions did not address whether families would count their young children, why or why not, and what would encourage them to count them. The online CBAMS survey did not address such questions. These were missed opportunities to learn more about why young children have a higher net undercount than any other age groups.

However, after the Bureau formed its 2020 Census Undercount of Young Children Task Force in November 2018, matters improved considerably. The final version of the operational plan paid significantly more attention to counting young children. <https://countallkids.org/updated-census-2020-operational-plan-counting-kids/> The communications plan was revised using outside research such as our communications study showing that parents needed to be told to count their young children and which messages would work to persuade them to do so and this plan included ads and produced materials focusing explicitly on who to count, not just encouragement to respond. The Bureau implemented a plan to do direct mailings to 14 million households in communities they identified as most likely to leave young children off their census forms, instructing them who to count (including to count their young children). The Partnership applauds all these changes which were due in significant part to the task force.

The Partnership also notes that the task force provided an excellent interface for those partners outside the Census Bureau with the Census Bureau to identify needs, provide information, and share resources.

This task force however only worked on the decennial census and has now been dissolved. The Partnership therefore recommends a permanent appointment for coordinating counting young children across the Bureau with a responsibility for serving as liaison with outside advocates that can provide support and insight for this work.

In addition, the Partnership specifically recommends that this person should be involved in planning for the 2030 Decennial Census, as that work has already begun. While the Bureau made significant improvements in its efforts to count young children in the last 18 months before the 2020 Census, it would have been far better to include efforts to count young children from the moment it started planning.

### **Evaluations of The 2020 Census With Respect To Counting Young Children**

The Partnership recommends that the Bureau conduct thorough evaluations of the efforts to count young children in the 2020 Census. It recommends that the Bureau report to the NAC on such planned evaluations, any changes that have been made to original proposals, and any evaluations that are no longer possible due to the pandemic and associated challenges. We also recommend that the Bureau develop new evaluations to measure the effectiveness of measures developed after the original slate of evaluations was developed. For example, it should develop an evaluation of the pre-census mailer about counting young children. If any enumerator debriefings were conducted they should be analyzed for any insight into counting young children. Efforts should be made to review the effectiveness of ads targeted at counting young children and other household members often left off census questionnaires.

The Bureau made significant changes in how it counted young children in 2020, for which we commend them, and it is important to assess what worked both for preparing for 2030 and for all Bureau demographic surveys since research has shown that most undercount young children.

Similarly, as the Census bureau reviews the results of the 2020 Census, they B should include comparisons specific to the count of young children. They should include analysis of the method of data collection used for households with young children (e.g., imputation rates, proxy rates broken out by household type – those with and without young children). Did families with young children respond at different rates to the various methods of collection than other households?

Finally, we encourage the Bureau to develop data quality metrics that speak directly to the completeness of data about young children and/or households with young children. We know that young children are often left off the census forms even when families respond, and we note that much of the focus is on response rates not completeness so they do not capture an important way in which young children are missed in the census (that is, they do not capture when households responded but left young children off). <https://www.census.gov/newsroom/blogs/random-samplings/2021/04/examining-operational-metrics.html>

In this regard, we also note that evaluations and data quality metrics must look at population subgroups and subnational data. In the 2010 Census, the national coverage rate masked a high national net undercount for young children. To properly assess census quality, we need to look at detailed levels of quality measures for subgroups such as young children and for state and sub state locations.

### **Evaluating the Use of Administrative Records**

For the first time, the 2020 Decennial Census made extensive use of administrative records. The Bureau reports that approximately one third of households were enumerated in the Non Response Follow Up (NRFU) stage and of those households, approximately 20% (or approximately 7% of all households) were enumerated using administrative records. <https://www.census.gov/newsroom/blogs/random-samplings/2021/04/examining-operational-metrics.html> . This apparently happened in a significant

proportion of cases after a census enumerator made a single visit to a household, so that in many cases administrative records effectively replaced interaction with a household member (the share of NRFU households in 2010 enumerated by talking with a household member is approximately equal to the number in 2020 enumerated by a combination of direct interviews and administrative records). We recognize that 2020 was an extraordinarily difficult year and acknowledge that this may well have been a necessary strategy in 2020. However, we recommend that until research can demonstrate that administrative records provide accurate data for young children, in future surveys and censuses, the Bureau use administrative records as a supplement not a replacement for self-response or NRFU interviews and complete a full series of NRFU visits before turning to administrative records.

We also recommend that the Bureau undertake an evaluation of the administrative record use, and that those evaluations specifically include an assessment of how well young children are reflected in administrative records used by the Census Bureau in 2020. We ask that the Bureau advise the NAC what evaluations of administrative record use are planned or underway and whether they include a young child component.

Using administrative records risks omitting young children in at least two ways. One of the primary administrative record uses is tax records.

- Tax records do not include babies born in the first three months of the decennial year.
- Tax records will not capture “doubled up” households unless both households file taxes. Yet families with young children are exceptionally prone to living in doubled up households because of their very high poverty rate and because the high cost of childcare makes it even harder for them to pay rent. These families are also likely to be so poor that they are not required to make a tax filing, and we know that about 20% of all EITC and CTC eligible families do not file even though they would benefit from claiming these refundable tax credits. We note that missing doubled up household would also disproportionately miss Black, Hispanic, and other communities of color both because they often have cultural preferences for living in extended family groups and because they are disproportionately lower income and forced to share households to cover rent.

There may be other ways in which administrative records miss children as well.

We know that the most accurate forms of data collection are self-response. Therefore, administrative records should only be used as adjuncts to self-response and NRFU, and where tax records are used, the Bureau should explicitly look for and use other administrative records that capture the second (or third, or fourth) families living at the same address. Those doubled-up families should also be counted; lack of a tax filing should not be used to “deduplicate” them. That is, administrative records indicating a second family lives at that address, such as SNAP or social security, should be treated as valid even if the family did not file a tax return.

### **Post-Enumeration Survey**

We recommend that the Bureau improve the PES so that it provides usable content on the accuracy of the census count of young children. Because of correlation bias, in the 2010 Census, the net undercount for ages 0 to 4 when measured using Demographic Analysis was 4.6% but from the PES it was 0.7 %.

This is significant because the PES is the major source of data on race/ethnicity and the only source of data on omissions.

We recommend that the Bureau consult with Census Scientific Advisory Committee, outside experts, or the National Academy of Sciences to find effective ways to address this shortcoming.

### **Upcoming Data Products**

The Partnership is very concerned that, because of formal privacy restrictions, the 2020 Census data products will provide inadequate data on young children. It is hard to comment on this in advance since the presentations have not yet been made available, but the most recent demonstration product does not provide any data for young children because its age breakout is limited to the population under age 18 and the population ages 18 and over. We strongly recommend that the Bureau develop products that provide tabulations for children ages 0 to 4 (ideally, by under 3 and 3 to 4), 5 to 12, and 13 to 17. These age groups are so different developmentally that it's critical to understand demographic differences—for example, how many very young children are living with both parents. How many are being reared by grandparents or other kin?

We understand that the Bureau will be asking for input on the new differential privacy demonstration product released in April 2021.

In order to provide helpful comments, we also recommend that the Bureau provide a list by data table (not just data product) of all young child data tables it will produce and all data tables it will no longer be able to produce.

We are critically concerned about whether the Bureau has determined how it will continue to link children and parents in order to produce critical data on children and household types. Since we have not yet received the slides for the NAC meeting, we do not know if this problem has been resolved. This is an essential form of information on the well-being of children. For example, this type of information is used in the yearly KIDS COUNT report from the Annie E. Casey Foundation.. We note in this context that should this challenge remain unresolved when formal privacy is applied to the ACS (which we understand will have a somewhat different approach to privacy), it will mean that the Bureau cannot produce child poverty measures. That is because child poverty is measured based on the income of the household they live in. Those are the single most important data on child well-being, and it is essential that the Bureau find a way to continue to produce them.

### **Household Pulse Survey**

The Partnership also recommends that the Bureau improve the Household Pulse Survey with respect to young children. We note that this survey has been extraordinarily important in assessing how children and families are faring during this difficult time, and we commend the Bureau for instituting it and for making regular improvements. We particularly commend most recent changes with respect to measuring access to childcare, children's reduced access to food, and children's access to preventive care. However, we have two recommendations to improve the survey further.

First, we recommend that the demographic data include asking how many children are in the household, how many are under five, how many are five to 12, and how many are 13 to 17. This would

make the data far more valuable. Children under five have very different childcare needs, for example. We are concerned about children ages 12 to 17 becoming disconnected from school and the work force if they are forced to work or care for other family members. We note that the survey does include the age groupings of adults; children have huge developmental differences in these age breakouts and breaking out the data by this information would help policy makers figure out how best to rebuild the childcare system, whether elementary schools or secondary schools need to improve their nutrition program outreach, and which age groups have the most disrupted schooling, to give only a few examples of how this data could be used.

Second, we note that the survey asks about the mental health needs of adults but does not assess the mental health of children. We ask that a separate set of questions be included in this. We hear disturbing reports of how children are faring, and this data would help schools develop counseling and mental health supports.

Third, we ask the Bureau to include a question on whether the household has temporary residents living with them because they have no other place to live. We are very concerned that homelessness/doubled up household numbers have increased and this question might elicit information on this point. Families with young children are disproportionately poor and therefore particularly likely to end up in such temporary living situations.

#### **Related to this meeting agenda: American Community Survey Roster Research**

We recommend that the American Community Survey (ACS) Methods Panel Test include rostering research specifically on making sure that families count their young children.

Perhaps the most important aspect of the proposed work in the (ACS) Methods Panel Test is on household rosters. There are two studies the Census Bureau should undertake in this regard. First, the Census Bureau should conduct a survey of parents with young children in the household to ask them if they understand young children are supposed to be included in the ACS survey roster. Several surveys found that many parents are not aware that young children were supposed to be included in the 2020 Census. The Count All Kids initiative conducted such a survey in 2019 and found that 10 percent of the survey respondents were not planning to include their young child in the 2020 Census and another 8 percent were not sure if they would include their young child in the 2020 Census. One common explanation for not including young children was the belief that the government did not need to know about them since they weren't as yet in school. Based on focus group research, many parents report that they did not see any reason why young children should be included on the 2020 Census questionnaire. The Count All Kids survey showed that minority parents were more likely than Non-Hispanic Whites parents to say they were not planning to include or were unsure they would include their child in the Census. It makes sense that many of these beliefs would carry over to a survey like the ACS.

The second study the Census Bureau should undertake on this topic is a test of new language in the ACS paper questionnaire and the online version to remind parents or householder to include young children in the ACS. It is important to couch this reminder about "young children" including terms like infants, newborns, toddlers, and preschoolers. Our focus group testing found that the term "young children" did not always equate to infants and toddlers. This is also related to another part of the methods panel test that plans to examine the impact of "using plain language to improve communication." Testing revised

rostering instructions with this language makes sense, but it may also be worth testing a separate question that asks if any children ages 0 to 4 live or stay at this address. This more direct approach might be more effective than simply clarifying instructions.

The Bureau is also asking for comments on the idea of not collecting detailed data for Person 5. We note that the ACS roster is generally completed from oldest to youngest person in the household. So, the move to collect less data on Person 5 is likely to have more of an impact on the completeness of data for young children than on adults. We recommend continuing to collect data on person 5.

Thank you for considering our recommendations, and for giving us this opportunity to comment.

Deborah Stein

Network Director